

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware  
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF JONATHAN AMES  
IN SUPPORT IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT

I, Jonathan Ames, declare as follows:

1. I have been employed by a wholly owned subsidiary of Getty Images, Inc. since 2011 and currently hold the position of Corporate Counsel, Director in the Los Angeles, California office. I am over 18 years of age, have personal knowledge of the facts set forth in this declaration, and am competent to testify to them.

2. On April 12, 2017, I was notified by Larry Busacca, Getty Images' Senior Director, North America Entertainment, that Ms. Motamedi still listed Getty Images as her job on LinkedIn. Mr. Busacca forwarded screenshots of Ms. Motamedi commenting on another LinkedIn member's profile, which showed her as a VP at Getty Images. Attached hereto as Exhibit 1 is a true and correct copy of the email and screenshots I received from Mr. Busacca.

DECLARATION OF JONATHAN AMES - 1

SEBRIS BUSTO JAMES  
14205 S.E. 36th Street, Suite 325  
Bellevue, Washington 98006  
Tel: (425) 454-4233 – Fax: (425) 453-9005



# **Exhibit 1**



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**From:** Larry Busacca  
**Sent:** Wednesday, April 12, 2017 6:10 AM  
**To:** Jon Ames <Jon.Ames@gettyimages.com>  
**Subject:** Info RM

Why is she allowed to still list Getty as her job on LinkedIn? See attached. First frame is the top half second is the scroll down. She is commenting and it shows she is a VP at Getty.

**Larry Busacca** | Senior Director, North America Entertainment  
p: [+1 16466133718](tel:+116466133718) | m: [917-763-5155](tel:917-763-5155)

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gettyimages® | iStock™







Alice Craig

Office Manager/Sales Associate at Andy Fische...

25 mins

3

Like Reply



**YETUNDE ADENIYI - ADEIGBE**

...

head, local services @ First Bank of Nigeria Ltd.

18 mins

3

Like Reply



**Lekan Olokunde, FCA** • 3rd

...

FC - H-HMO

17 mins

1

Like Reply



**ROXANNE MOTAMEDI** • 1st

...

VP Global Entertainment at Getty Images. Digi...

7 d

3

Like Reply | 2 Likes

Add a comment...

Post



Home



My Network



Messaging



Notifications



Jobs

## **Exhibit 2**



1st

ROXANNE MOTAMEDI

VP Global Entertainment at Getty Images. Digital Strategy & Partnerships, Strategic Business Development. Until Nov 2016

Getty Images • Bard College  
Greater Los Angeles Area • 500+ 

Message

Highlights